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10 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

11 TRISHA GALANG,) CASE NO.: 2:10-cv-01229-PMP-LRL
12 Plaintiff,)
13 vs.)
14 AMERICAN FAMILY MUTUAL INSURANCE)
COMPANY; AMERICAN FAMILY)
15 INSURANCE; DOES I through V; and ROE)
16 CORPORATIONS I through IV, inclusive.)
17 Defendants.)

18 **PROPOSED DISCOVERY PLAN AND SCHEDULING ORDER**

19 The above named parties, by and through their respective counsel of record, hereby submit their
20 stipulated discovery plan and scheduling order pursuant to FRCP 26(f) and Local Rule 26-1(e) for the
21 Court's approval. This plan is submitted in compliance with the timing rules set forth in LR26-1(e),
22 measured from the date of the 26(f) conference, October 28, 2010.

23 **DISCOVERY PLAN**

24 1. The parties do not anticipate any changes to the timing, form or requirement for
25 disclosure under FRCP 26(a). Disclosures under FRCP 26(a) were made or will be made by both parties
26 on or before November 29, 2010.

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2. The parties anticipate discovery may be needed on the issues of the respective liability, if any, of the parties and the damages, if any, sustained by the Plaintiff. The parties do not request that discovery be conducted in phases or be limited to or focused on particular issues.

3. The parties do not request that any changes be made to the limitations on discovery under the Federal Rules of Civil Procedure or the Local Rules of Practice of the United States District Court for the District of Nevada.

4. The parties do not request any other orders under the FRCP 26(c), FRCP 16(b) OR FRCP 16(c).

PROPOSED SCHEDULE

1. Discovery Cut-Off Date: Defendants filed their Answer to Plaintiff's Complaint on July 22, 2010. As stipulated between the parties, discovery will commence once the Discovery Plan has been submitted to the court. All Discovery must be completed no later than August 1, 2011

2. Amendment of Pleadings and Addition of Parties: Unless Otherwise stated herein or ordered by the Court, the date of filing motions to amend the pleadings or add parties shall not be later than ninety (90) days prior to the discovery cut-off date and no later than May 3, 2011.

3. Disclosure of Expert Witnesses: In accordance with FRCP 26(a)(2), disclosures identifying expert witnesses shall be made sixty (60) days prior to discovery cut-off date and no later than June 2, 2011, and disclosures respecting rebuttal experts shall be made thirty (30) days after the disclosure of experts and not later than July 1, 2011.

4. Interim status Report: On or before June 2, 2011, (60) days prior to the close of discovery, the parties shall file an Interim Status Report, as required by LR 26-3, stating the time estimated for trial, three alternative dates for trial, and whether or not trial will be proceeding or affected by substantive motions.

5. Dispositive Motions: The filing of Dispositive Motions shall not be later than thirty (30) days after the discovery cut-off date and not later than August 31, 2011.

6. Pretrial Order: The Joint Pretrial Order shall be filed no later than thirty (30) days after the date set for filing Dispositive Motions and not later than September 30, 2011.


In the event Dispositive Motions are filed, the date for filing the Joint Pretrial Order shall be suspended

1 until thirty (30) days after the decision of the Dispositive Motions or further order of the court.

2 7. Extensions or Modifications of the Discovery Plan and Scheduling Order: In accordance
3 with LR 26-a, any stipulations or motion for modification or extension of this discovery plan and
4 scheduling order must be made no later than twenty (20) days before the discovery cut-off date, or no
5 later than July 12, 2011.

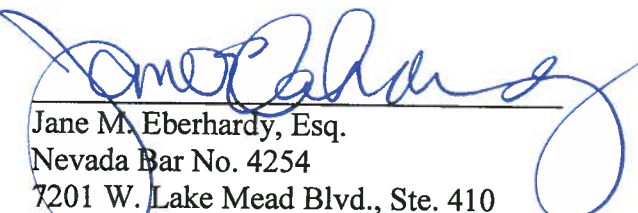
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7 DATED this 9th day of December, 2010.

8 AARON & PATERNOSTER, LTD.

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Attorneys for Plaintiff

DATED this 6 day of December, 2010.

LAW OFFICE OF ARTHUR W. TUVerson

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17 IT IS SO ORDERED.



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20 UNITED STATES MAGISTRATE JUDGE
21 DATED: 12-13-10